



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5
77 WEST JACKSON BOULEVARD
CHICAGO, IL 60604-3590

MAR 20 2013

REPLY TO THE ATTENTION OF:
WC-15J

CERTIFIED MAIL 7009 1680 0000 7678 5174
RETURN RECEIPT REQUESTED

Peter Baranyai, Utility Director
East Chicago Sanitary District
5201 Indianapolis Boulevard
East Chicago, Indiana 46312

Subject: Wet Weather/Sanitary Sewer System Information Request
Issued Pursuant to Section 308(a) of the Clean Water Act, 33 U.S.C. § 1318(a)
Docket No. V-W-13-308-06

Dear Mr. Baranyai:

Protecting water quality is a high priority of the U.S. Environmental Protection Agency. Pollutants such as bacteria discharged to waterways from sewer overflows contribute to poor water quality and impairment of uses of those waterways. As authorized by the Clean Water Act (CWA), the National Pollutant Discharge Elimination System (NPDES) permit program controls water pollution by regulating point sources that discharge pollutants into waters of the United States.

The Indiana Department of Environmental Management (IDEM) issued NPDES permit number IN0022829 to the East Chicago Sanitary District. The permit authorizes discharges to waters of the United States in accordance with effluent limitations, monitoring requirements and other conditions set forth in the permit. The enclosed Information Request seeks information related to the operation and maintenance of the portion of the District's sanitary sewer collection system that collects and conveys sewage to the East Chicago Sanitary District Sewage Treatment Plant including information about sewer overflows that may have left the collection system prior to receiving required treatment.

EPA is authorized under Section 308(a) of the CWA, 33 U.S.C. § 1318(a) to require reports and other information necessary to carry out the purpose of the CWA. Accordingly, pursuant to Section 308(a) of the CWA, you are directed to provide EPA with the information requested in the enclosure.

In accordance with Section V, Paragraph 2 of the Information Request, you must include with your response a statement certifying that all information you submit is true and accurate to the

best of your knowledge and belief using the certification language provided in that paragraph. Any questions that do not directly relate to your municipality's sanitary sewer system operations can be addressed with "not applicable" and a brief explanation.

Please exercise care to assure that responses are complete and accurate because Section 309(c)(2) of the CWA, 33 U.S.C. § 1319(c)(2), imposes criminal penalties where false information is knowingly provided to EPA.

You must submit a written response with the information requested in the enclosure within 30 days of receipt of this request to:

Water Enforcement and Compliance Assurance Branch (WC-15J)
U.S. Environmental Protection Agency, Region 5
77 West Jackson Boulevard
Chicago, Illinois 60604-3590
Attention: Keith Middleton, Environmental Engineer

Thank you for your cooperation in this matter. Should you have any questions, please contact Keith Middleton of my staff by telephone at (312) 886-6465 or by e-mail at middleton.keith@epa.gov.

Sincerely,



for Tinka G. Hyde
Director, Water Division

Enclosure

cc: Mark Stanifer, Indiana Department of Environmental Management

**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5**

IN THE MATTER OF:)	Docket No. V-W-13-308-06
)	
East Chicago Sanitary District)	
East Chicago, Indiana)	Proceeding under Section 308(a) of
)	the Clean Water Act, as amended,
)	33 U.S.C. § 1318(a)
NPDES Permit No. IN0022829)	

INFORMATION REQUEST

I. STATUTORY AUTHORITY

The U.S. Environmental Protection Agency is issuing this Information Request to the East Chicago Sanitary District (You) pursuant to the authority given to the Administrator of EPA by Section 308(a) of the Clean Water Act (CWA), 33 U.S.C. § 1318(a). The Administrator has delegated this authority to the Regional Administrator of EPA, Region 5, who has re-delegated this authority to the Director of the Water Division, EPA Region 5.

II. INSTRUCTIONS

1. You must respond to this Information Request within 30 calendar days of your receipt of this request. Submission instructions are in Section V of this Information Request.
2. You must respond separately to each of the requests. Where a "yes" or "no" answer is requested, You may provide additional information, if desired. Precede each answer with the number of the request to which it corresponds. For each document produced in response to this Information Request, indicate on the document, or in some other reasonable manner, the number of the request to which it corresponds.
3. If You do not have documents responsive to a particular request, state in your written response that You do not have responsive documents.
4. You must keep the reports and all records reviewed or generated in the course of responding to this Information Request until EPA informs You in writing that You are no longer required to keep the reports and records, or for three years, whichever is sooner.

III. DEFINITIONS

1. "Backup" or "Building/Property Backup" shall mean any release of wastewater to public or private property that is caused by Blockages or other conditions in the Sanitary Sewer System. Such releases can include, but are not limited to, those that occur in basements.
2. "Blockage" shall mean the partial or complete interruption of flow as a result of some obstruction in any portion of the Sanitary Sewer System.
3. "Bypass," as defined by 40 C.F.R. § 122.41(m), shall mean the intentional diversion of waste streams from any portion of a treatment facility.
4. "Collection System" shall mean all portions of your sewer system that collect and convey sanitary and/or combined sewage for treatment to the East Chicago Sanitary District Waste Water Treatment Facility (WWTF). The Collection System, for purposes of this Information Request, does not refer to a separate storm sewer system.
5. "Combined Sewer System(s)" shall mean all portions of your sewer system designed to convey municipal sewage (domestic, commercial, and industrial wastewater) and stormwater through a single-pipe system to the wastewater treatment plant or to combined sewer outfalls.
6. "Day" or "days" shall mean a calendar day or calendar days. In computing any period of time under this Information Request, where the last day would fall on a Saturday, Sunday, or federal or state holiday, the period shall run until the close of the next business day.
7. "Force Main" shall mean any pipe that carries wastewater under pressure from the discharge side of a pump to a point of gravity flow downstream.
8. "Gravity Sewer" shall mean a pipe that receives, contains, and conveys wastewater that is not normally under pressure and is intended to flow unassisted under the influence of gravity.
9. "Infiltration" shall mean water, other than wastewater, that enters your Sanitary Sewer System (including sewer service connections) from the ground through such means as defective pipes, pipe joints, connections, or manholes.
10. "Inflow" shall mean water, other than wastewater, that enters your Sanitary Sewer System from sources such as, but not limited to, roof leaders, cellar drains, yard drains, area drains, foundation drains, drains from springs and swampy areas, manhole covers, cross connections between storm sewers and sanitary sewers, catch basins, cooling towers, stormwater, surface runoff, street wash waters, or drainage.
11. "I/I" shall mean the total quantity of water from Infiltration and Inflow without distinguishing the source.

12. "Private Lateral" shall mean that portion of the Sanitary Sewer System(s), not owned by You, used to convey wastewater from a building or buildings to that portion of the Sanitary Sewer System(s) owned by You.
13. "Pump Station" shall mean facilities comprised of pumps or other equipment that lift wastewater to a higher hydraulic elevation, including all related electrical, mechanical, and structural systems necessary to the operation of that pumping station.
14. "Record" or "records" shall mean any recording of information in tangible form. It includes, but is not limited to, documents, memoranda, reports, letters, maps, graphs, charts, log books, notes, emails, computer files, computer printouts, and computer databases.
15. "Sanitary Sewer Overflow" or "SSO" shall mean an overflow, spill, diversion, or release of wastewater from or caused by your Sanitary Sewer System(s). This term shall include:
(i) discharges to waters of the United States from the Sanitary Sewer System(s); and (ii) any release of wastewater from the Sanitary Sewer System(s) to public or private property that does not reach waters of the United States, including Backups.
16. "Sanitary Sewer System(s)" shall mean all portions of your sewer system (including all pipes, Force Mains, Gravity Sewer segments, overflow structures, regulators, Pump Stations, manholes, and components thereof), designed and constructed to collect and convey only sewage, and not stormwater, from residences, commercial buildings, industrial plants, and institutions for treatment at East Chicago Sanitary District WWTF.
17. "Satellite Sewer System" shall mean a sewer Collection System that collects wastewaters from a legal entity other than You and delivers these wastewaters to your receiving sewer(s) or interceptor(s). Legal entities can include unincorporated areas. The Satellite Sewer System often, but not always, depends on a downstream authority for the treatment of these transferred wastewaters.
18. "Wastewater Treatment Plant(s)" or "WWTP(s)" shall mean the wastewater treatment plant(s) operated by You, East Chicago Sanitary District WWTF, National Pollutant Discharge Elimination System (NPDES) Permit Number IN0022829 and located at 5201 Indianapolis Boulevard, East Chicago, Indiana and all components of such sewage treatment plant(s).
19. "You" for purposes of this Information Request refers to the East Chicago Sanitary District and to any agents, employees, contractors, or other people or entities that performed work or acted in any way on behalf of, or at the direction of, East Chicago Sanitary District.

IV. REQUESTS

General Information

1. Provide the name and address of the location(s) where You maintain records relative to the operation and maintenance (O&M) of your Sanitary Sewer System(s).
2. Provide the name and title of the primary contact person(s) responsible for Sanitary Sewer System operation and maintenance. Also provide telephone, fax, and email contact information for such person(s).
3. Provide the latest NPDES permit (IN0022829) issued to You for the WWTP/Sanitary Sewer System(s), including modifications and the associated permit application.

Collection System/Service Area

4. Provide the following information for your Sanitary Sewer System(s):
 - a. Service area (in square miles) _____
 - b. Population served _____
 - c. System inventory _____

Miles of Gravity Sewer	Miles of Force Main	Number of Pump Stations

- d. Number of service connections:

Residential _____ Commercial _____
 Industrial _____ Total _____

- e. Provide actual flows experienced for the previous 12 months expressed in million gallons per day (MGD). Cite the source or calculation method from which You obtained these values (e.g., flow meters, billing statements, etc.).

	Average Daily Wastewater Flow (MGD)	Source (or calculation method) of Average Daily Wastewater Flow Values	Average Daily Water Consumption (MGD)	Source (or calculation method) of Average Daily Water Consumption Values
Residential				
Commercial				
Industrial				
Other				
Total				

f. Minimum wastewater flow experienced in a 24 hour period for the previous 12 months expressed in MGD: _____

g. Is the Collection System a Combined Sewer System?

Yes _____ No _____

If yes, what percent of the Collection System is combined? _____

h. Provide infrastructure age distribution estimates for the Collection System.

Age	Gravity Sewer, miles	Force Mains, miles or feet	Number of Pump Stations
0 - 25 years			
26 - 50 years			
51 - 75 years			
> 76 years			

i. Provide pipe size distribution estimates for the Collection System.

Diameter in inches	Gravity Sewer, miles	Force Mains, miles or feet
8 inches or less		
9 - 18 inches		
19 - 36 inches		
> 36 inches		

5. Indicate or describe a property owner's responsibility for maintenance and repair of Private Laterals (check one):

a. At main line connection only _____

b. From main line to property line or easement/cleanout _____

c. Beyond property line/cleanout _____

d. Other _____

Explain _____

6. Describe any atypical local conditions that may increase the complexity or difficulty of the design, construction, operation, and maintenance of the Collection System.

7. Identify whether You do the following to determine if the capacity of the existing Sanitary Sewer System(s) is adequate for new connections.

a. Is flow metering performed prior to allowing new connections?

Yes _____ No _____

b. Do You use a hydraulic model of the Sanitary Sewer System(s) to predict the effects of new connections?

Yes _____ No _____

c. Do You require written certification by a licensed professional engineer indicating that the Sanitary Sewer System(s) has been determined to have adequate capacity to accommodate flow from new connections?

Yes _____ No _____

8. Are there portions of the Collection System service areas that have experienced street flooding, with sewage as a component, in the past five years?

Yes _____ No _____

If yes, describe and list all areas that experience chronic street flooding.

Satellite Sewer Systems/Sewer Use Ordinance (SUO)

9. Does the Collection System receive flow from Satellite Sewer System communities?

Yes _____ No _____

If yes, complete the following chart. If additional room is needed, continue on last page or attach a separate table.

Satellite Community Name	% Flow Contributed	Primary Contact Name and Contact Information (address, phone, email) for Satellite

10. Do Satellite Sewer System communities enter into written agreements for wastewater services (contracts, charters, court orders, etc.) with You?

Yes _____ No _____

If yes, please answer the following questions listed below:

- a. Do the agreements extend the requirements of the sewer use ordinance (SUO) to the Satellite Sewer System communities?
Yes _____ No _____
- b. Do You maintain the legal authority to control the maximum flow introduced into the Collection System from Satellite Sewer System communities?
Yes _____ No _____
- c. Is flow metered at locations where flow from the Satellite Sewer System communities directly enters your Sanitary Sewer System(s)?
Yes _____ No _____
- d. Do You have the authority to surcharge Satellite Sewer System communities for excessive flows (i.e., for excessive I/I)?
Yes _____ No _____
- e. Have You exercised your authority to surcharge Satellite Sewer System communities for excessive flows (i.e., for excessive I/I)?
Yes _____ No _____

If yes, identify the Satellite Sewer System communities for which You took this action, when You took the action, and describe the action You took.

11. Indicate whether the SUO contains procedures for the following:

- a. Inspection standards Yes _____ No _____
- b. Pretreatment requirements Yes _____ No _____
- c. Building/sewer permit issues Yes _____ No _____
- d. Inflow prohibition Yes _____ No _____

12. Indicate whether the SUO contains procedures and enforcement authority to control the following:

- a. Fats, oils, and grease Yes _____ No _____
- b. I/I Yes _____ No _____
- c. Building structures over the sewer lines Yes _____ No _____
- d. Stormwater connections to sanitary lines Yes _____ No _____
- e. Defects in Private Laterals Yes _____ No _____
- f. Sump pump or air conditioner discharge Yes _____ No _____

Force Mains

13. Identify the total number of Force Main failures that have occurred in the last five years.

14. Provide a description of the cause(s) of each Force Main failure that has occurred in the last five years.

Pump Stations

15. Provide the following information related to Pump Stations in your Collection System:

- a. Total number of Pump Stations in the Collection System _____
- b. Number of Pump Stations with on-site pump capacity redundancy _____
- c. Number of Pump Stations with dry weather capacity limitations _____
- d. Number of Pump Stations with wet weather capacity limitations _____
- e. Number of Pump Station failures resulting in SSOs, or Backups, in the last five years _____
- f. Number of Pump Stations fed with electrical power from at least two independent electrical power grid feeds _____
- g. Number of Pump Stations with permanently installed backup power generators onsite that automatically activate when supplied power is interrupted _____
- h. Number of Pump Stations with backup power capability, but only with portable generators to be brought to the Pump Station site from other locations _____
- i. Number of Pump Stations with "pump around" capability (i.e., where Pump Station wet well can be evacuated and pumped with portable pump to nearby downstream Sanitary Sewer System manhole) _____
- j. Number of Pump Stations where conditions are monitored remotely and that trigger an alarm at a central monitoring location (e.g., at the WWTP or central public works center) _____

Wastewater Treatment Plant

16. Provide the following design flow ratings for the WWTP in MGD.

- a. Design Average Daily Flow _____
- b. Design Peak Wet Weather Flow _____

17. Provide the following peak actual flows experienced at the WWTP in the last five years in MGD.

- a. Peak Daily Flow _____
- b. Peak Hourly Flow _____

c. Peak Instantaneous Flow _____

18. Describe any processes or operations that can limit the treatment capacity or efficiency at the WWTP (e.g., pump capacity, flow restrictions, tank size, etc.).

19. Provide the following data for each year for the last five years:

- a. Dates and descriptions of WWTP effluent limit exceedances
- b. Dates and volumes of flows from the Collection System that did not receive full secondary treatment
- c. Dates of treatment upsets at the WWTP due to wet weather flow

20. For each event identified in response to Question 19b, indicate whether the discharge condition is authorized under your NPDES permit. If the discharge condition is permitted, specify the permit provision authorizing such discharge.

Sanitary Sewer Overflows

21. Describe each SSO that has occurred in the Collection System within the last five years. Include the following information for each SSO (create a supplemental table as necessary to list the data below):

- a. Date of the SSO
- b. Location of the SSO
- c. Estimated volume of the SSO (in gallons or million gallons (MG))
- d. Cause of the SSO
- e. How You determined that the SSO occurred
- f. Depth of precipitation (in inches) received (if any) contributing to the SSO
- g. Peak WWTP flow (in MGD) on the day that the SSO occurred
- h. Disposition of the SSO (i.e., did the release reach a waterway, flow to storm sewer, paved areas, etc.)
- i. Actions taken to mitigate the SSO
- j. Whether or not You reported the SSO to the state environmental agency
- k. How soon after the SSO You reported it
- l. Whether any samples of the SSO discharge were collected and analyzed

22. Identify the number of SSOs that originated from each of the following sources in the last five years:

- a. Manholes _____
- b. Pump Stations _____
- c. Main and trunk sewers _____
- d. Lateral and branch sewers _____
- e. Structural Bypasses or relief points _____
- f. Force Mains _____
- g. Other, explain: _____

23. Identify the volume of SSOs expressed in gallons or MG from each of the following sources in the last five years:

- a. Pump Stations _____
- b. Force Mains _____
- c. Manholes _____
- d. Other, explain: _____

24. Identify the number of SSOs caused by the following in the last five years:

- a. Debris buildup _____
- b. Collapsed pipe _____
- c. Root intrusion _____
- d. Capacity limitations _____
- e. Excessive I/I _____
- f. Fats, oil, and grease _____
- g. Vandalism _____
- h. Power interruption and/or lack of backup power source _____
- i. Mechanical or electronic failure _____
- j. Pump failure and/or lack of backup (or duplex) pumps _____
- k. Other, explain: _____

25. For the SSOs to waterways that are identified in response to Question 21, how many were to surface waters that could affect:

- a. Primary contact recreation (swimming, bathing, waterskiing, etc.) _____
- b. Shellfish growing areas _____
- c. Drinking water sources _____

26. What equipment is available to You for responding to SSOs?

27. Describe how You monitor SSO occurrence and frequency.

28. Identify whether You have developed and adopted written procedures or instructions for the following:

- a. Identifying SSOs Yes _____ No _____
- b. Emergency response for SSOs Yes _____ No _____
- c. Reporting all SSOs to the state regardless of size Yes _____ No _____
- d. Containment or cleanup to mitigate the effect of SSOs Yes _____ No _____
- e. Problem evaluation and resolution Yes _____ No _____

29. Describe your procedure for reporting SSOs to the state environmental agency.

Backups

30. Describe how You document the occurrence of, and response to, Backups.
31. Indicate the month and year when You began to document Backups: _____
32. Provide the following information related to Backups:
- a. Number of Backups that have occurred in each year for the last five years: _____
 - b. Number of Backups that occurred in each year for the last five years that was determined to be the responsibility of the East Chicago Sanitary District:
2008 _____
2009 _____
2010 _____
2011 _____
2012 _____

33. Are there portions of the Collection System that have chronic problems with Backups?
Yes _____ No _____

If yes, list and describe each area and the reasons for chronic Backups in that area.

Blockages

34. Describe how your document the occurrence of, and response to, Blockages.
35. Provide the following information related to Blockages that have occurred in your Collection System in each year for the last five years:
- a. Number of Blockages for each year
 - b. Average time to clear a Blockage (minutes)
 - c. Number of Blockages resulting in SSOs and/or Backups for each year
 - d. Total volume of SSOs (gallons or MG) that resulted from Blockages for each year

Infiltration and Inflow

36. Provide the following information for I/I in the Sanitary Sewer System(s):
- a. Have You done an assessment to determine the extent of I/I?
Yes _____ No _____ If yes, when? _____ (mo/yr)
 - b. Has it been demonstrated that it is more cost effective to eliminate rather than treat I/I?
Yes _____ No _____
 - c. Have You performed a sewer system evaluation study (SSES), as defined in the U.S. EPA Handbook for Sewer System Evaluation and Rehabilitation (December 1975)?

Yes _____ No _____ If yes, when? _____ (mo/yr)

d. Have rehabilitation projects been prioritized for correcting I/I problems?

Yes _____ No _____

If yes, how far has the I/I elimination program progressed?

e. Do You or any of your Satellite Sewer System communities have a private source I/I reduction program?

Yes _____ No _____

If yes, describe the program.

Operation and Maintenance

37. Have You developed a capacity, management, operation, and maintenance (CMOM) program, as defined in the U.S. EPA Guide for Evaluating Capacity, Management, Operation, and Maintenance (CMOM) Programs at Sanitary Sewer Collection Systems (January 2005)?

Yes _____ No _____ If yes, when? _____ (mo/yr)

38. Describe the operation and maintenance (O&M) procedures You have in place to locate and eliminate problems in your Collection System that would cause or contribute to SSOs and Backups. These procedures can include, but are not limited to, grease control, root control, sewer cleaning, I/I evaluation, problem area targeting, downspout disconnection program, etc.

39. Indicate whether You have developed and adopted written procedures or instructions for the following:

- | | |
|--|--------------------|
| a. Collection system maintenance | Yes _____ No _____ |
| b. Collection system capacity management | Yes _____ No _____ |

40. Does the Sanitary Sewer System(s) experience chronic O&M problems that are attributed to design problems?

Yes _____ No _____

If yes, provide a brief explanation.

41. Does the Sanitary Sewer System(s) experience chronic O&M problems that are the result of construction issues in the system?

Yes _____ No _____

If yes, provide a brief explanation.

42. Do You physically inspect all sanitary system manholes on a defined frequency?

Yes _____ No _____

If yes, on what frequency: every _____ months (e.g., every 36 months)

43. List the frequency of cleaning sewers and manhole basins for the following:

a. Largest sewers: every _____ months (e.g., every 36 months)

b. Smaller sewers: every _____ months

44. Do You conduct internal smoke testing to evaluate the condition of the Collection System?

Yes _____ No _____

If yes, on what frequency? Every _____ months (e.g., every 36 months)

45. Is there a formalized Sanitary Sewer Overflow Emergency Response Plan or a similar plan to responded to SSOs, in accordance with pages 2-22 and 2-23 of U.S. EPA's Guide for Evaluating CMOM Programs at Sanitary Sewer Collection Systems, EPA 305-B-05-002 (January 2005)?

Yes _____ No _____

46. Do You televise the sewers to evaluate the condition of the Collection System?

Yes _____ No _____

47. Do You operate an industrial pretreatment program approved by EPA or the State?

Yes _____ No _____

Wastewater User and Customer Complaints

48. Describe how You receive, document, and respond to citizen complaints regarding the Sanitary Sewer System.

49. Provide the following information related to Sanitary Sewer System user complaints:

a. Number of user complaints received each year for the last five years

b. Number of user complaints received each year for the last five years that were your responsibility

c. Number of claims received and damages paid each year for the last five years

50. Provide the number of public health or other warnings You issued that were attributed to wastewater each year for the last five years and the dates of each such warning.

V. SUBMITTALS

1. Please submit your response to this Information Request within 30 days of your receipt of the Information Request to:

Water Enforcement and Compliance Assurance Branch (WC-15J)
U.S. Environmental Protection Agency, Region 5
77 West Jackson Boulevard
Chicago, Illinois 60604-3590
Attention: Keith Middleton, Environmental Engineer

2. You must submit all requested information under an authorized signature with the following certification:

I certify under penalty of law that this response and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person(s) who manage the system, or those person(s) directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate and complete. I am aware that there are significant penalties for submitting false information, including the possibility of a fine and imprisonment for knowing violations.

3. If You find at any time after submitting information to EPA that any portion of the submittal is false or incorrect, You must notify EPA immediately. Knowing submittal of false information to EPA in response to this Information Request may subject You to criminal prosecution under Section 309(c) of the CWA, 33 U.S.C. § 1319(c), and 18 U.S.C. §§ 1001 and 1341.
4. You may not withhold information because You claim it is confidential. However, pursuant to 40 C.F.R. Part 2, Subpart B, You may assert a claim of business confidentiality regarding any portion of the information submitted in response to this Information Request, as provided in 40 C.F.R. § 2.302(a)(2). The regulations provide that a person may assert a business confidentiality claim covering part or all of the information furnished to EPA when that person submits the information. The manner of asserting such claims is specified in 40 C.F.R. § 2.203(b). Effluent data (as defined in 40 C.F.R. § 2.302(A)(2)) and information in NPDES permit applications is not entitled to confidential treatment. 40 C.F.R. § 122.7. Information subject to a business confidentiality claim is available to the public only to the extent, and by means of the procedures, set forth in 40 C.F.R. Part 2, Subpart B. If You do not assert a claim of business confidentiality when You submit the information, EPA may make the information available to the public without further notice.
5. This Information Request is not subject to the Paperwork Reduction Act, 44 U.S.C. § 3501 *et seq.*, because it seeks collection of information from specific individuals or entities as part of an administrative action or investigation.

6. EPA may use the information submitted in response to this Information Request in an administrative, civil or criminal action.
7. Neither the issuance of this Information Request by EPA nor your compliance with this Information Request relieves You of liability for any penalty, fine, remedy or sanction authorized to be imposed pursuant to Section 309(b), (c), (d), or (g) of the CWA, 33 U.S.C. § 1319(b), (c), (d), or (g), including but not limited to those related to any violations addressed by this Information Request. EPA specifically reserves the right to seek any of the remedies specified in Section 309(b), (c), (d), or (g) of the CWA, 33 U.S.C. § 1319(b), (c), (d), or (g).
8. There can be significant civil or criminal penalties for failing to adequately respond to requests for information issued under the Section 308(a) of the CWA, 33 U.S.C. § 1318(a).
9. Please contact Keith Middleton of my staff by telephone at (312) 886-6465, or via email at middleton.keith@epa.gov, if You have any questions about this Information Request.



Tinka G. Hyde

Director, Water Division
U.S. Environmental Protection Agency, Region 5

3/20/2013
Date



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5
77 WEST JACKSON BOULEVARD
CHICAGO, IL 60604-3590

MAY 15 2013

REPLY TO THE ATTENTION OF:

WC-15J

CERTIFIED MAIL 7009 1680 0000 7678 5419
RETURN RECEIPT REQUESTED

Mr. Steven Barrett
Public Works Superintendent
9446 South Raymond Avenue
Oak Lawn, Illinois 60453

Subject: Wet Weather/Sanitary Sewer System Information Request
Issued Pursuant to Section 308(a) of the Clean Water Act, 33 U.S.C. § 1318(a)
Docket No. V-W-13-308-07

Dear Mr. Barrett:

Protecting water quality is a high priority of the U.S. Environmental Protection Agency. Pollutants such as bacteria discharged to waterways from sewer overflows contribute to poor water quality and impairment of uses of those waterways. As authorized by the Clean Water Act (CWA), the National Pollutant Discharge Elimination System (NPDES) permit program controls water pollution by regulating point sources that discharge pollutants into waters of the United States.

The enclosed Information Request seeks information related to the operation and maintenance of the portion of the Village of Oak Lawn's sewer collection system that collects and conveys sewage to the Metropolitan Water Reclamation District of Greater Chicago including information about sewer overflows that may have left the collection system prior to receiving required treatment.

EPA is authorized under Section 308(a) of the CWA, 33 U.S.C. § 1318(a), to require reports and other information necessary to carry out the purpose of the CWA. Accordingly, pursuant to Section 308(a) of the CWA, you are directed to provide EPA with the information requested in the enclosure.

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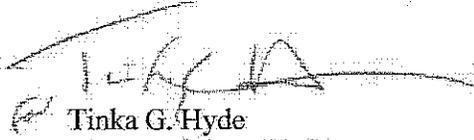
Please exercise care to assure that responses are complete and accurate because Section 309(e)(2) of the CWA, 33 U.S.C. § 1319(c)(2), imposes criminal penalties where false information is knowingly provided to EPA.

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U.S. Environmental Protection Agency, Region 5
Water Enforcement and Compliance Assurance Branch (WC-15J)
77 West Jackson Boulevard
Chicago, Illinois 60604-3590
Attention: Felicia Chase, Environmental Scientist

Thank you for your cooperation in this matter. Should you have any questions, please contact Felicia Chase of my staff at (312) 886-0240 or by e-mail at chase.felicia@epa.gov.

Sincerely,



Tinka G. Hyde
Director, Water Division

Enclosure

cc: *Bud Bridgewater*, IEPA, w/enclosure

**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5**

IN THE MATTER OF:)	Docket No. V-W-13-308-07
)	
Village of Oak Lawn, Illinois;)	Proceeding under Section 308(a) of
)	the Clean Water Act, as amended,
)	33 U.S.C. § 1318(a)
_____)	

INFORMATION REQUEST

I. STATUTORY AUTHORITY

The U.S. Environmental Protection Agency is issuing this Information Request to Oak Lawn (you) pursuant to the authority vested in the Administrator of EPA by Section 308(a) of the Clean Water Act (CWA), 33 U.S.C. § 1318(a). The Administrator has delegated this authority to the Regional Administrator of EPA, Region 5, who has re-delegated this authority to the Director of the Water Division, EPA, Region 5.

II. INSTRUCTIONS

1. You must submit the requested information within 30 days after you receive this Information Request. Submission instructions are in Section V of this Information Request.
2. You must respond separately to each of the requests. Where a "yes" or "no" answer is requested, you may provide additional information, if desired. Precede each answer with the number of the request to which it corresponds. For each document produced in response to this Information Request, indicate on the document, or in some other reasonable manner, the number of the request to which it corresponds.
3. If you do not have documents responsive to a particular request, state in your written response that you do not have responsive documents.
4. You must keep the reports and all records reviewed or generated in the course of responding to this Information Request until EPA informs you in writing that you are no longer required to keep the reports and records, or for three years, whichever is sooner.

III. DEFINITIONS

1. "Backup" or "building/property backup" shall mean any release of wastewater to public or private property that is caused by blockages or other conditions in the sanitary sewer system. Such releases can include, but are not limited to, those that occur in basements.
2. "Blockage" shall mean the partial or complete interruption of flow as a result of some obstruction in any portion of the sanitary sewer system.
3. "Bypass," as defined by 40 C.F.R. § 122.41(m), shall mean the intentional diversion of waste streams from any portion of a treatment facility.
4. "Collection system" shall mean all portions of your sewer system that collect and convey sanitary or combined sewage for treatment to the Metropolitan Water Reclamation District of Greater Chicago's (MWRDGC) interceptor sewers which transport the sewage to a wastewater treatment plant. The collection system, for purposes of this Information Request, does not refer to a separate storm sewer system.
5. "Combined sewer system(s)" shall mean all portions of your sewer system designed to convey municipal sewage (domestic, commercial, and industrial wastewater) and stormwater through a single-pipe system to MWRDGC's interceptor sewers or to combined sewer outfalls.
6. "Day" or "days" shall mean a calendar day or calendar days. In computing any period of time under this Information Request, where the last day would fall on a Saturday, Sunday, or federal or state holiday, the period shall run until the close of the next business day.
7. "Force main" shall mean any pipe that carries wastewater under pressure from the discharge side of a pump to a point of gravity flow downstream.
8. "Gravity sewer" shall mean a pipe that receives, contains, and conveys wastewater that is not normally under pressure and is intended to flow unassisted under the influence of gravity.
9. "Infiltration" shall mean water, other than wastewater, that enters your sanitary sewer system (including sewer service connections) from the ground through such means as defective pipes, pipe joints, connections, or manholes.
10. "Inflow" shall mean water, other than wastewater, that enters your sanitary sewer system from sources such as, but not limited to, roof leaders, cellar drains, yard drains, area drains, foundation drains, drains from springs and swampy areas, manhole covers, cross connections between storm sewers and sanitary sewers, catch basins, cooling towers, stormwater, surface runoff, street wash waters, or drainage.
11. "I/I" shall mean the total quantity of water from infiltration and inflow without distinguishing the source.

12. "Private lateral" shall mean that portion of the sanitary sewer system(s), not owned by you, used to convey wastewater from a building or buildings to that portion of the sanitary sewer system(s) owned by you.
13. "Pump station" shall mean facilities comprised of pumps or other equipment that lift wastewater to a higher hydraulic elevation, including all related electrical, mechanical, and structural systems necessary to the operation of that pump station.
14. "Record" or "records" shall mean any recording of information in tangible form. It includes, but is not limited to, documents, memoranda, reports, letters, maps, graphs, charts, log books, notes, emails, computer files, computer printouts, and computer databases.
15. "Sanitary sewer overflow" or "SSO" shall mean an overflow, spill, diversion, or release of wastewater from or caused by your sanitary sewer system(s). This term shall include: (i) discharges to waters of the United States from the sanitary sewer system(s); and (ii) any release of wastewater from the sanitary sewer system(s) to public or private property that does not reach waters of the United States, including backups.
16. "Sanitary sewer system(s)" shall mean all portions of your sewer system (including all pipes, force mains, gravity sewer segments, overflow structures, regulators, pump stations, manholes, and components thereof), designed and constructed to collect and convey only sewage, and not storm water, from residences, commercial buildings, industrial plants, and institutions to MWRDGC's interceptor sewers.
17. "Satellite Sewer System" shall mean a sewer collection system that collects wastewaters from a legal entity other than you and delivers these wastewaters to your receiving sewer(s) or interceptor(s). Legal entities can include unincorporated areas. The satellite sewer system often, but not always, depends on a downstream authority for the treatment of these transferred wastewaters.
18. "Wastewater Treatment Plant" or "WWTP" shall mean MWRDGC's Stickney Water Reclamation Plant, and all components of such sewage treatment plant, located in Cicero, Illinois.
19. "You" for purposes of this Information Request refers to Oak Lawn and to any agents, employees, contractors, or other entities that performed work or acted in any way on behalf of, or at the direction of, Oak Lawn.

IV. REQUESTS

General Information

1. Provide the name and address of the location(s) where you maintain records regarding the operation and maintenance (O&M) of your sanitary sewer system(s).
2. Provide the name and title of the primary contact person(s) responsible for sanitary sewer system collection and maintenance. Also provide telephone, fax, and email contact information for such person(s).
3. Provide the following documents:
 - a. The current NPDES permit, if applicable, issued to you for the sanitary sewer system(s), including modifications and the associated permit application.
 - b. A map of the service area for your sanitary sewer system(s) that identifies the following information:
 - i. Delineation of separate and combined sewer areas, if applicable
 - ii. Locations of SSOs reported in response to Question 16, chronic street flooding areas reported in response to Question 8, and chronic backup areas reported in response to Question 28 (can be hand-written/drawn on map)
 - iii. Location of all permitted and/or non-permitted outfalls for your sanitary sewer system(s) and for your combined sewer system(s)

Collection System/Service Area

4. Provide the following information for your sanitary sewer system(s):
 - a. Service area (in square miles) _____
 - b. Population served _____
 - c. System inventory _____

Miles of Gravity Sewer	Miles of Force Main	Number of Pump Stations

- d. Number of service connections:

Residential _____
 Industrial _____

Commercial _____
 Total _____

- e. Provide actual flows experienced for the previous 12 months expressed in million gallons per day (MGD). Cite the source or calculation method from which you obtained these values (e.g., flow meters, billing statements, etc.).

	Average Daily Wastewater Flow (MGD)	Source (or calculation method) of Average Daily Wastewater Flow Values	Average Daily Water Consumption (MGD)	Source (or calculation method) of Average Daily Water Consumption Values
Residential				
Commercial				
Industrial				
Other				
Total				

- f. Minimum wastewater flow experienced in a 24 hour period for the previous 12 months expressed in MGD: _____

- g. Is the collection system a combined sewer system?
Yes _____ No _____

If yes, what percent of the collection system is combined? _____

- h. Provide infrastructure age distribution estimates for the collection system.

Age	Gravity Sewer, miles	Force Mains, miles or feet	Number of Pump Stations
0 - 25 years			
26 - 50 years			
51 - 75 years			
> 76 years			

- i. Provide pipe size distribution estimates for the collection system.

Diameter in inches	Gravity Sewer, miles	Force Mains, miles or feet
8 inches or less		
9 - 18 inches		
19 - 36 inches		
> 36 inches		

5. Indicate or describe a property owner's responsibility for maintenance and repair of private laterals (check one):

- a. At main line connection only _____
 - b. From main line to property line or easement/cleanout _____
 - c. Beyond property line/cleanout _____
 - d. Other _____
- Explain _____

6. Describe any local conditions that may increase the complexity or difficulty of the design, construction, operation, and maintenance of the collection system.

7. Identify whether you do the following to determine if the capacity of the existing sanitary sewer system(s) is adequate for new connections.

- a. Is flow metering performed prior to allowing new connections?
Yes ___ No ___
- b. Do you use a hydraulic model of the sanitary sewer system(s) to predict the effects of new connections?
Yes ___ No ___
- c. Do you require written certification by a licensed professional engineer indicating that the sanitary sewer system(s) has been determined to have adequate capacity to accommodate flow from new connections?
Yes ___ No ___

8. Are there portions of the collection system service areas that have experienced street flooding, with sewage as a component, in the past five years?

Yes ___ No ___

If yes, describe and list all areas that experience chronic street flooding.

Satellite Sewer Systems/Sewer Use Ordinance

9. Does the collection system receive flow from satellite sewer system communities?

Yes ___ No ___

If yes, complete the following chart. If additional room is needed, continue on last page or attach a separate table.

Satellite Community Name	% Flow Contributed	Primary Contact Name and Contact Information (address, phone, email) for Satellite

10. Do satellite sewer system communities enter into written agreements for wastewater services (contracts, charters, court orders, etc.) with you?

Yes _____ No _____

If yes, please answer the following questions listed below:

a. Do the agreements extend the requirements of the sewer use ordinance (SUO) to the satellite sewer system communities?

Yes _____ No _____

b. Do you maintain the legal authority to control the maximum flow introduced into the collection system from satellite sewer system communities?

Yes _____ No _____

c. Is flow metered at locations where flow from the satellite sewer system communities directly enters your sanitary sewer system(s)?

Yes _____ No _____

d. Do you have the authority to surcharge satellite sewer system communities for excessive flows (i.e., for excessive I/I)?

Yes _____ No _____

e. Have you exercised your authority to surcharge satellite sewer system communities for excessive flows (i.e., for excessive I/I)?

Yes _____ No _____

If yes, identify the satellite sewer system communities for which you took this action, when you took the action, and describe the action you took.

11. Indicate whether the SUO contains procedures for the following:

a. Inspection standards

Yes _____ No _____

b. Pretreatment requirements

Yes _____ No _____

- c. Building/sewer permit issues Yes _____ No _____
- d. Inflow prohibition Yes _____ No _____

12. Indicate whether the SUO contains procedures and enforcement authority to control the following:

- a. Fats, oils, and grease Yes _____ No _____
- b. I/I Yes _____ No _____
- c. Building structures over the sewer lines Yes _____ No _____
- d. Storm water connections to sanitary lines Yes _____ No _____
- e. Defects in private laterals Yes _____ No _____
- f. Sump pump or air conditioner discharge Yes _____ No _____

Force Mains

13. Identify the total number of force main failures that have occurred in the last five years.

14. Provide a description of the cause(s) of each force main failure that has occurred in the last five years.

Pump Stations

15. Provide the following information related to pump stations in your collection system:

- a. Total number of pump stations in the collection system _____
- b. Number of pump stations with on-site pump capacity redundancy _____
- c. Number of pump stations with dry weather capacity limitations _____
- d. Number of pump stations with wet weather capacity limitations _____
- e. Number of pump station failures resulting in SSOs, or backups, in the last five years _____
- f. Number of pump stations fed with electrical power from at least two independent electrical power grid feeds _____
- g. Number of pump stations with permanently installed backup power generators onsite that automatically activate when supplied power is interrupted _____
- h. Number of pump stations with backup power capability, but only with portable generators to be brought to the pump station site from other locations _____
- i. Number of pump stations with "pump around" capability (i.e., where pump station wet well can be evacuated and pumped with portable pump to nearby downstream sanitary sewer system manhole) _____
- j. Number of pump stations where conditions are monitored remotely and that trigger an alarm at a central monitoring location (e.g., at the central public works center) _____

Sanitary Sewer Overflows

16. Describe each SSO that has occurred in the collection system within the last five years. Include the following information for each SSO (create a supplemental table as necessary to list the data below):

- a. Date of the SSO
- b. Location of the SSO
- c. Estimated volume of the SSO (in gallons or million gallons (MG))
- d. Cause of the SSO
- e. How you determined that the SSO occurred
- f. Depth of precipitation (in inches) received (if any) contributing to the SSO
- g. Peak WWTP flow (in MGD) on the day that the SSO occurred
- h. Disposition of the SSO (i.e., did the release reach a waterway, flow to storm sewer, paved areas, etc.)
- i. Actions taken to mitigate the SSO
- j. Whether or not you reported the SSO to the state environmental agency
- k. How soon after the SSO you reported it
- l. Whether any samples of the SSO discharge were collected and analyzed

17. Identify the number of SSOs that originated from each of the following sources in the last five years:

- a. Manholes _____
- b. Pump stations _____
- c. Main and trunk sewers _____
- d. Lateral and branch sewers _____
- e. Structural bypasses or relief points _____
- f. Force mains _____
- g. Other, explain: _____

18. Identify the volume of SSOs expressed in gallons or MG from each of the following sources in the last five years:

- a. Pump stations _____
- b. Force mains _____
- c. Manholes _____
- d. Other, explain: _____

19. Identify the number of SSOs caused by the following in the last five years:

- a. Debris buildup _____
- b. Collapsed pipe _____
- c. Root intrusion _____
- d. Capacity limitations _____

- e. Excessive I/I _____
- f. Fats, oil, and grease _____
- g. Vandalism _____
- h. Power interruption and/or lack of backup power source _____
- i. Mechanical or electronic failure _____
- j. Pump failure and/or lack of backup (or duplex) pumps _____
- k. Other, explain: _____

20. For the SSOs to waterways that are identified in response to Question 16, how many were to surface waters that could affect:

- a. Primary contact recreation (swimming, bathing, waterskiing, etc.) _____
- b. Shellfish growing areas _____
- c. Drinking water sources _____

21. What equipment is available to you for responding to SSOs?

22. Describe how you monitor SSO occurrence and frequency.

23. Identify whether you have developed and adopted written procedures or instructions for the following:

- a. Identifying SSOs Yes _____ No _____
- b. Emergency response for SSOs Yes _____ No _____
- c. Reporting all SSOs to the state regardless of size Yes _____ No _____
- d. Containment or cleanup to mitigate the effect of SSOs Yes _____ No _____
- e. Problem evaluation and resolution Yes _____ No _____

24. Describe your procedure for reporting SSOs to the state environmental agency.

Backups

25. Describe how you document the occurrence of, and response to, backups.

26. Indicate the month and year when you began to document backups: _____

27. Provide the following information related to backups:

- a. Number of backups that have occurred in each year for the last five years; and
- b. Number of backups in each year for the last five years for which you were liable

28. Are there portions of the collection system that have chronic problems with backups?
 Yes _____ No _____

If yes, list and describe each area and the reasons for chronic backups in that area.

Blockages

29. Describe how you document the occurrence of, and response to, blockages.
30. Provide the following information related to blockages that have occurred in your collection system in each year for the last five years:
- a. Number of blockages for each year
 - b. Average time to clear a blockage (minutes)
 - c. Number of blockages resulting in SSOs and/or backups for each year
 - d. Total volume of SSOs (gallons or MG) that resulted from blockages for each year

Infiltration and Inflow

31. Provide the following information for I/I in the sanitary sewer system(s):
- a. Have you done an assessment to determine the extent of I/I?
Yes _____ No _____ If yes, when? _____ (mo/yr)
 - b. Has it been demonstrated that it is more cost effective to eliminate rather than treat I/I?
Yes _____ No _____
 - c. Have you performed a sewer system evaluation study (SSES), as defined in the U.S. EPA Handbook for Sewer System Evaluation and Rehabilitation (December 1975, <http://yosemite.epa.gov/water/owrccatalog.nsf/1ffc8769fdec48085256ad3006f39fa/3bf1715386cfbcf785256b0600723c07!OpenDocument>)?
Yes _____ No _____ If yes, when? _____ (mo/yr)
 - d. Have rehabilitation projects been prioritized for correcting I/I problems?
Yes _____ No _____

If yes, how far has the I/I elimination program progressed?
 - e. Do you or any of your satellite sewer system communities have a private source I/I reduction program?
Yes _____ No _____

If yes, describe the program.

Operation and Maintenance

32. Have you developed a capacity, management, operation, and maintenance (CMOM) program, as defined in the U.S. EPA Guide for Evaluating Capacity, Management, Operation, and Maintenance (CMOM) Programs at Sanitary Sewer Collection Systems (January 2005, http://www.epa.gov/npdes/pubs/cmom_guide_for_collection_systems.pdf)?

Yes _____ No _____

If yes, when? _____ (mo/yr)

33. Describe the operation and maintenance (O&M) procedures you have in place to locate and eliminate problems in your collection system that would cause or contribute to SSOs and backups. These procedures can include, but are not limited to, grease control, root control, sewer cleaning, I/I evaluation, problem area targeting, downspout disconnection program, etc.

34. Indicate whether you have developed and adopted written procedures or instructions for the following:

a. Collection system maintenance

Yes _____ No _____

b. Collection system capacity management

Yes _____ No _____

35. Does the sanitary sewer system(s) experience chronic O&M problems that are attributed to design problems?

Yes _____ No _____

If yes, provide a brief explanation.

36. Does the sanitary sewer system(s) experience chronic O&M problems that are the result of construction issues in the system?

Yes _____ No _____

If yes, provide a brief explanation.

37. Do you physically inspect all sanitary system manholes on a defined frequency?

Yes _____ No _____

If yes, on what frequency: every _____ months (e.g., every 36 months)

38. List the frequency of cleaning sewers and manhole basins for the following:

a. Largest sewers: every _____ months (e.g., every 36 months)

b. Smaller sewers: every _____ months

39. Do you conduct internal smoke testing to evaluate the condition of the collection system?

Yes _____ No _____

If yes, on what frequency? Every _____ months (e.g., every 36 months)

40. Do you televise the sewers to evaluate the condition of the collection system?

Yes _____ No _____

41. Do you operate an industrial pretreatment program approved by EPA or the State?

Yes _____ No _____

Wastewater User and Customer Complaints

42. Describe how you receive, document, and respond to citizen complaints regarding the sanitary sewer system.
43. Provide the following information related to sanitary sewer system user complaints:
 - a. Number of user complaints received each year for the last five years
 - b. Number of user complaints received each year for the last five years that were your responsibility
 - c. Number of claims received and damages paid each year for the last five years
44. Provide the number of public health or other warnings you issued that were attributed to wastewater each year for the last five years and the dates of each such warning.

V. SUBMITTALS

1. Please submit the requested information within 30 days after you receive this Information Request to:

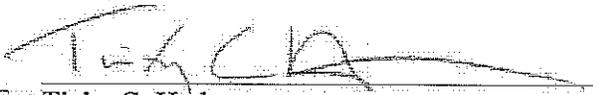
Water Enforcement and Compliance Assurance Branch (WC-15J)
U.S. Environmental Protection Agency, Region 5
77 West Jackson Boulevard
Chicago, Illinois 60604-3590
Attention: Felicia Chase, Environmental Scientist

2. You must submit all requested information under an authorized signature with the following certification:

I certify under penalty of law that this response and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person(s) who manage the system, or those person(s) directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate and complete. I am aware that there are significant penalties for submitting false information, including the possibility of a fine and imprisonment for knowing violations.

3. If you find at any time after submitting information to EPA that any portion of the submittal is false or incorrect, you must notify EPA immediately. Knowing submittal of false information to EPA in response to this Information Request may subject you to criminal prosecution under Section 309(c) of the CWA, 33 U.S.C. § 1319(c), and 18 U.S.C. §§ 1001 and 1341.

4. You may not withhold information because you claim it is confidential. However, pursuant to 40 C.F.R. Part 2, Subpart B, you may assert a claim of business confidentiality regarding any portion of the information submitted in response to this Information Request, as provided in 40 C.F.R. § 2.302(a)(2). The regulations provide that a person may assert a business confidentiality claim covering part or all of the information furnished to EPA when that person submits the information. The manner of asserting such claims is specified in 40 C.F.R. § 2.203(b). Effluent data (as defined in 40 C.F.R. § 2.302(A)(2)) and information in NPDES permit applications is not entitled to confidential treatment. 40 C.F.R. § 122.7. Information subject to a business confidentiality claim is available to the public only to the extent, and by means of the procedures, set forth in 40 C.F.R. Part 2, Subpart B. If you do not assert a claim of business confidentiality when you submit the information, EPA may make the information available to the public without further notice.
5. This Information Request is not subject to the Paperwork Reduction Act, 44 U.S.C. § 3501 *et seq.*, because it seeks collection of information from specific individuals or entities as part of an administrative action or investigation.
6. EPA may use the information submitted in response to this Information Request in an administrative, civil or criminal action.
7. EPA reserves all right and remedies, legal and equitable, available to address any violation of the CWA. Neither the issuance of this Information Request nor your compliance with this Information Request precludes enforcement action pursuant to Section 309 of the CWA, 33 U.S.C. § 1319, for any violation addressed by this Information Request or any other violation of the CWA.
8. There can be significant civil or criminal penalties for failing to adequately respond to requests for information issued under the Section 308(a) of the CWA, 33 U.S.C. § 1318(a).
9. Please contact Felicia Chase of my staff by telephone at (312) 886-0240, or via email at chase.felicia@epa.gov, if you have any questions about this Information Request.


Tinka G. Hyde
Director, Water Division
U.S. Environmental Protection Agency, Region 5

5/15/13
Date



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5
77 WEST JACKSON BOULEVARD
CHICAGO, IL 60604-3590

JUN 12 2013

REPLY TO THE ATTENTION OF:

WC-15J

CERTIFIED MAIL 7009 1680 0000 7669 4421
RETURN RECEIPT REQUESTED

Mr. Jerry Schill
Vice President, Operations
Chemical Solvents, Incorporated
3751 Jennings Road
Cleveland, Ohio 44109

Subject: Information Request under Section 308(a) of the Clean Water Act
33 U.S.C. § 1318(a), Docket No. V-W-13-308-08

Dear Mr. Schill:

The U. S. Environmental Protection Agency is requiring Chemical Solvents, Inc. (CSI or you) to submit certain information about the facility located at 3751 Jennings Road in Cleveland, Ohio. The enclosed Information Request specifies the information that you must submit. You are required to submit this information within 30 calendar days after you receive this request unless otherwise stated in the Requests for Information section of the attached Information Request.

EPA is authorized under Section 308 of the Clean Water Act (Act), 33 U.S.C. § 1318, to require reports and other information necessary to carry out the purposes of the Act. Accordingly, pursuant to Section 308 of the Act, 33 U.S.C. § 1318, you are directed to provide EPA with the information requested in the enclosure.

Please exercise care to assure that responses are complete and accurate, because Section 309(c)(2) of the Act, 33 U.S.C. § 1319(c)(2), provides for the imposition of criminal penalties for any person that knowingly violates Section 308 of the Act.

In submitting the information required in this request, CSI shall provide the following certification signed by an official or authorized agent:

I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person(s) who manage the system, or those person(s) directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.

EPA may use any information submitted in response to this request in an administrative, civil, or criminal action.

If you have technical questions, please direct them to Jonathan Moody, Water Enforcement and Compliance Assurance Branch, Section 1, at (312) 353-4621. If you have legal questions, please call Gary Steinbauer, Office of Regional Counsel, at (312) 886-4306.

We appreciate your cooperation and look forward to you prompt compliance and response to the Information Request.

Sincerely,

A handwritten signature in black ink, appearing to read 'Tinka G. Hyde', with a long horizontal flourish extending to the right.

Tinka G. Hyde
Director, Water Division

Enclosure

cc: Donna Kniss, Ohio EPA, NEDO

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY REGION 5

IN THE MATTER OF:)	Docket No. V-W-13-308-08.
Chemical Solvents, Inc.)	
3751 Jennings Road)	Proceeding under
Cleveland, Ohio 44109)	Section 308(a) of the
)	Clean Water Act, as amended,
Permit No.)	33 U.S.C. § 1318(a)
Northeast Ohio Regional Sanitary District)	
Administrative Order No. 896-S-SIU-12)	

INFORMATION REQUEST

The U.S. Environmental Protection Agency is requiring Chemical Solvents Inc. (CSI or you) to submit certain information about the facility located at 3751 Jennings Road in Cleveland, Ohio. You must send this information to us within 30 calendar days after you receive this request.

We are issuing this Information Request under Section 308(a) of the Clean Water Act (CWA), 33 U.S.C. § 1318(a). Section 308(a) authorizes the Administrator of EPA to require the submission of information. The Administrator has delegated this authority to the Director of the Water Division, Region 5. There can be significant civil or criminal penalties for failing to respond adequately to requests for information issued under CWA Section 308(a).

DEFINITIONS

1. The term "person" as used herein, in the plural as well as singular, shall mean any natural person, firm, contractor, corporation, partnership, trust or governmental entity, unless the context indicates otherwise.
2. "Record", "records", "document" and "documentation" are defined for purposes of this Information Request as any recording of information in any form. It includes, but is not limited to, documents, emails, memoranda, reports, letters, maps, graphs, charts, log books, notes, computer files, computer printouts, and computer databases.
3. "And" and "Or". The words "and" and "or" shall be construed conjunctively or disjunctively as necessary to make the Information Request inclusive rather than exclusive, and bring within the scope of this Information Request any information which might otherwise be construed to be outside the scope.
4. "Chemical Solvents" or "you" is defined as Chemical Solvents, Inc. or anyone acting on its behalf.
5. "Facility" is defined as the facility owned or operated by you, which is located at 3751 Jennings Road, Cleveland, Ohio 44109.

6. "NEORSD" shall mean the Northeast Ohio Regional Sewer District.
7. "NEORSD collection system" shall mean the NEORSD sewerage collection/treatment system as referred to in the NEORSD Control mechanism.
8. "NPDES" shall mean the National Pollution Discharge Elimination System authorized under the Clean Water Act.
9. "Control mechanism" shall have the same meaning as the term is used in 40 C.F.R. Part 403. For the purposes of this Information Request, NEORSD has issued Administrative Order No. 896-S-SIU-12 to CSI to act as the control mechanism.
10. "Storm Water Pollution Prevention Plan" or "SWPPP" is defined as a requirement of the NPDES permit and details required inspections, annual monitoring and Best Management Practices (BMPs).
11. "Domestic wastewater" is defined as wastewater containing only conventional pollutants as defined by Section 304(a)(4) of Clean Water Act. This includes waste and wastewater from humans or household operations.
12. "Dilutional wastewater" is defined as wastewater containing discharges of non-contact cooling water, boiler blowdown or other wastewater discharges that are not considered process wastewater.
13. "Process wastewater" is defined as any water which, during manufacturing or processing, comes into direct contact with or results from the production or use of any raw material, intermediate product, finished product, byproduct, or waste product.
14. "Storm water" is defined as storm water runoff, snow melt runoff, and surface runoff and drainage.
15. "Wastewater" is defined as any water discharged from the facility. This includes domestic wastewater, dilutional wastewater, process wastewater, storm water, and any other water discharged to the sewer system.

INSTRUCTIONS

1. Provide a separate narrative response to each and every request set forth in this Information Request. Precede each answer with the reference (e.g., Request No.) and the text of that particular request.
2. Any documents relied upon or used by you to answer any of the requests must be copied and submitted to EPA with your response. All documents must contain a notation indicating the reference(s) (e.g., Request No.) to which they are responsive.

3. If information or documents not known or not available to you as of the date of submission of your response to this request should later become known or available to you, you must supplement your response to EPA. Moreover, should you find, at any time after the submission of your response, that any portion of the submitted information is false or misrepresents the truth, you must notify EPA of this fact as soon as possible and provide a corrected response. Knowingly providing false information in response to this request is actionable under 18 U.S.C. §§ 1001 and 1341.
4. If a request cannot be answered in full, answer to the extent possible along with an explanation of why the request cannot be answered in full. If your responses are qualified in any manner, please explain the reason for the qualification(s).
5. For this Information Request, words used in the singular shall also mean and include the plural and vice versa.
6. A statement of certification as provided in this Information Request must be submitted along with your responses every time a submission is made pursuant to this Information Request.
7. You shall maintain the reports and all records reviewed or generated in the course of responding to this Information Request until EPA informs you in writing that maintenance of such records is no longer required.
8. Unless otherwise specified, the Requests for Information cover the entire five-year period immediately preceding the date on which you receive this Information Request.

REQUESTS FOR INFORMATION

1. For each person consulted in preparing your responses to these Requests for Information, provide the full name and title, name of the individual's employer, and business telephone number.
2. For the previous ten year period immediately preceding the date on which you receive this Information Request, provide copies of the application(s) for the NEORS D Control mechanism (issued April 19, 2012), any prior administrative orders, permits, or other control mechanisms issued by NEORS D for discharges of wastewater from the facility, and any additional information or requests to modify these administrative orders, permits, or other control mechanisms.
3. Regardless of the dates any such applications were submitted, provide copies of applications for Permits to Install (PTI) for pretreatment equipment issued by the Ohio Environmental Protection Agency (Ohio EPA) to you for the facility. Include attachments to the PTI and the copies of as-built construction drawings.

4. For the previous ten year period immediately preceding the date on which you receive this Information Request, provide copies of applications for any permits issued to you for the facility under the NPDES program.
5. Provide copies of any flow monitoring and results of samples taken at the Discharge Point 01 designated in the NEORS D Control mechanism.
6. Provide copies of all flow monitoring and results of all samples taken of wastewater discharged to the NEORS D collection system. CSI does not need to provide duplicate copies of records if the records were provided in response to a prior request.
7. Provide copies of reports made to NEORS D for any malfunction of pretreatment equipment pursuant to Part 4.F of the NEORS D Control mechanism.
8. Provide copies of reports made to NEORS D for any shut down or bypass of pretreatment equipment pursuant to Part 4.G of the NEORS D Control mechanism.
9. Provide copies of reports made to NEORS D for any advanced notification to NEORS D for changes to effluent quality or quantity pursuant to Part 4.H of the NEORS D Control mechanism.
10. Provide copies of any bills for municipal water that you purchased for the facility. Include a description of the means for measuring the volume of water used.
11. Provide copies of any bills and measurements for wastewater discharged to the NEORS D sewer system from the facility. Include a description of the means for measuring the volume of water discharged.
12. Provide a narrative description of each discharge of wastewater to the NEORS D collection system from the facility, including the date of the discharge, content of the wastewater discharged, the amount of wastewater discharged, and the flow rate of the wastewater discharged.
13. Provide a drawing of the onsite sewer collection system at the facility. In the drawing, indicate all locations where wastewater is discharged to the onsite sewer system. All wastewater will include domestic wastewater, process wastewater, dilutional wastewater, and storm water. The drawing must include the size and location of the following structures and appurtenances:
 - a. Underground pipes and conveyance structures;
 - b. Manholes, catchbasins and inlets;
 - c. All connections to manholes, catchbasins and inlets;
 - d. All pumps conveying wastewater (indicate type of pump);
 - e. Valves (indicate type of valve and operation);
 - f. All locations where wastewater is discharged to the onsite sewer system;

- g. All locations where trucked or hauled waste is discharged to the onsite sewer system; and
- h. All locations where the onsite system connects to the NEORSR collection system.

If the items depicted on the drawing of the onsite sewer collection system at the facility have changed during the previous ten years, please describe any such changes, including the specific item changed, the date of the change, and the reason for the change.

14. Provide a copy of the Slug Discharge Control Plan (SDCP) detailed in Part 4.E of the NEORSR control mechanism.
15. Provide copies of the following records maintained in support of the SDCP:
 - a. Analysis of raw water accumulated in diked areas prior to discharge to the sewer system;
 - b. Records of stored chemicals listed in Part 4.E.2 of the NEORSR Control mechanism;
 - c. Copies of written incident reports completed following identification of spills or leaks;
 - d. Records of annual employee training on spills and contingency procedures.
16. Provide a list of the dates and volumes of all wastewater discharged from the facility to the NEORSR collection system.
17. Provide a list of all Bioaccumulative Chemicals of Concern (BCCs) which have been brought into the facility for purposes of reclamation, recovery, or treatment. Include in the list the dates any water or wastes derived from the manufacture or blending of BCCs were transported from the Facility. For any water or wastes derived from the manufacture or blending of BCCs that were transported from the Facility, describe the manner in which such water or wastes were disposed and provide any documentation supporting the disposal of such water or wastes. The list of BCCs includes:
 - Chlordane
 - DDD
 - DDE
 - DDT
 - Dieldrin
 - Hexachlorobenzene
 - Hexachlorobutadiene
 - Hexachlorocyclohexane (BHC)
 - alpha-Hexachlorocyclohexane
 - beta-Hexachlorocyclohexane
 - delta-Hexachlorocyclohexane
 - Lindane
 - Mercury

- Mirex
 - Octachlorostyrene
 - Photomirex
 - PCBs
 - Pentachlorobenzene
 - 2,3,7,8-TCDD
 - 1,2,3,4-Tetrachlorobenzene
 - 1,2,4,5-Tetrachlorobenzene
 - Toxaphene
18. Provide a list of all chemicals which have been brought into the facility for purposes of reclamation, recovery, or treatment. Include in the list the dates such chemicals were received at the facility and the dates and means of removal from the facility. CSI does not need to provide duplicate copies of records if the records are provided in response to one of the paragraphs contained earlier in this Request.
19. Provide copies of all correspondence between you and NEORS. CSI does not need to provide duplicate copies of correspondence if the documents are provided in response to one of the paragraphs contained earlier in this Request.

Please submit your responses to this request within the designated time frames to:

U. S. Environmental Protection Agency
Attention: Jonathan Moody
Water Enforcement and Compliance Assurance Branch
Water Division, WC-15J
77 West Jackson Blvd.
Chicago, Illinois 60604-3590
(312)-697-2753
moody.jonathan@gmail.com

with a courtesy copy of site map and topographic map required by ILR00 to:

Donna Kniss
Ohio EPA, Division of Surface Water
Pretreatment Program
2110 E. Aurora Road
Twinsburg, Ohio 44087
Phone: 800-686-6330

You may consider confidential the information that you submit to us. You may assert a claim of business confidentiality for any portion of the submitted information, except effluent data, under 40 C.F.R. Part 2, Subpart B. Information subject to a business confidentiality claim is available to the public only to the extent allowed under

40 C.F.R. Part 2, Subpart B. Failure to assert a business confidentiality claim makes all submitted information available to the public without further notice.

In submitting the information required in this request, CSI shall provide the following certification signed by an official or authorized agent:

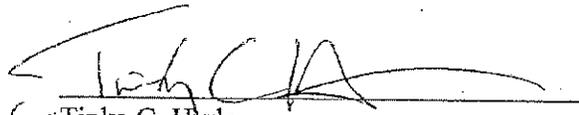
I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person(s) who manage the system, or those person(s) directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.

If at any time after submitting the requested information, the signatory determines that any portion of such statement(s) certified as true is false or incorrect, the signatory must notify EPA. Knowingly providing false information in response to this request may be actionable under §309(c)(4) of the Act, and 18 U.S.C. §§ 1001 and 1341.

EPA may use the information submitted in response to this request in an administrative, civil, or criminal action.

This request is not subject to the Paperwork Reduction Act, 44 U.S.C. § 3501 et seq., because it seeks to collect information from specific individuals or entities as part of an administrative action or investigation.

Please contact Jonathan Moody of my staff at (312) 353-4621 or via email at moody.jonathan@epa.gov, or Gary Steinbauer, Office of Regional Counsel, at (312) 886-4306 or steinbauer.gary@epa.gov, if you have any questions about this request. Neither the issuance of this request by EPA nor compliance with this request by you, relieves you of liability for any penalty, fine, remedy, or sanction authorized to be imposed pursuant to Sections 309(b), (c), (d), and/or (g) of the Act, including but not limited to any violations addressed by this request. EPA specifically reserves the right to seek any or all of the remedies specified in Sections 309(b), (c), (d), and/or (g) of the Act.


Tinka G. Hyde
Director, Water Division

10/12/13
Date



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5
77 WEST JACKSON BOULEVARD
CHICAGO, IL 60604-3590

JUN 12 2013

REPLY TO THE ATTENTION OF:

WC-15J

CERTIFIED MAIL 7009 1680 0000 7669 4438
RETURN RECEIPT REQUESTED

Mr. Jerry Schill
Vice President, Operations
Chemical Solvents, Incorporated
3751 Jennings Road
Cleveland, Ohio 44109

Subject: Information Request under Section 308(a) of the Clean Water Act
33 U.S.C. § 1318(a), Docket No. V-W-13-308-09

Dear Mr. Schill:

The U. S. Environmental Protection Agency is requiring Chemical Solvents, Inc. (CSI or you) to submit certain information about the facility located at 1010 Denison Avenue in Cleveland, Ohio. The enclosed Information Request specifies the information that you must submit. You are required to submit this information within 30 calendar days after you receive this request unless otherwise stated in the Requests for Information section of the attached Information Request.

EPA is authorized under Section 308 of the Clean Water Act (Act), 33 U.S.C. § 1318, to require reports and other information necessary to carry out the purposes of the Act. Accordingly, pursuant to Section 308 of the Act, 33 U.S.C. § 1318, you are directed to provide EPA with the information requested in the enclosure.

Please exercise care to assure that responses are complete and accurate, because Section 309(c)(2) of the Act, 33 U.S.C. § 1319(c)(2), provides for the imposition of criminal penalties for any person that knowingly violates Section 308 of the Act.

In submitting the information required in this request, CSI shall provide the following certification signed by an official or authorized agent:

I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the

person(s) who manage the system, or those person(s) directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.

EPA may use any information submitted in response to this request in an administrative, civil, or criminal action.

If you have technical questions, please direct them to Jonathan Moody, Water Enforcement and Compliance Assurance Branch, Section 1, at (312) 353-4621. If you have legal questions, please call Gary Steinbauer, Office of Regional Counsel, at (312) 886-4306.

We appreciate your cooperation and look forward to your prompt compliance and response to the Information Request.

Sincerely,

A handwritten signature in black ink, appearing to read 'Tinka G. Hyde', with a long horizontal flourish extending to the right.

Tinka G. Hyde
Director, Water Division

Enclosure

cc: Donna Kniss, Ohio EPA, NEDO

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY REGION 5

IN THE MATTER OF:)	Docket No. V-W-13-308-09
Chemical Solvents, Inc.)	
1010 Denison Avenue)	Proceeding under
Cleveland, Ohio 44109)	Section 308(a) of the
)	Clean Water Act, as amended,
Permit No.)	33 U.S.C. § 1318(a)
Northeast Ohio Regional Sanitary District)	
Administrative Order No. 796-S-SIU-12)	

INFORMATION REQUEST

The U.S. Environmental Protection Agency is requiring Chemical Solvents Inc. (CSI or you) to submit certain information about the facility located at 1010 Denison Avenue in Cleveland, Ohio. You must send this information to us within 30 calendar days after you receive this request.

We are issuing this Information Request under Section 308(a) of the Clean Water Act (CWA), 33 U.S.C. § 1318(a). Section 308(a) authorizes the Administrator of EPA to require the submission of information. The Administrator has delegated this authority to the Director of the Water Division, Region 5. There can be significant civil or criminal penalties for failing to respond adequately to requests for information issued under CWA Section 308(a).

DEFINITIONS

1. The term "person" as used herein, in the plural as well as singular, shall mean any natural person, firm, contractor, corporation, partnership, trust or governmental entity, unless the context indicates otherwise.
2. "Record", "records", "document" and "documentation" are defined for purposes of this Information Request as any recording of information in any form. It includes, but is not limited to, documents, emails, memoranda, reports, letters, maps, graphs, charts, log books, notes, computer files, computer printouts, and computer databases.
3. "And" and "Or". The words "and" and "or" shall be construed conjunctively or disjunctively as necessary to make the Information Request inclusive rather than exclusive, and bring within the scope of this Information Request any information which might otherwise be construed to be outside the scope.
4. "Chemical Solvents" or "you" is defined as Chemical Solvents, Inc. or anyone acting on its behalf.

5. "Facility" is defined as the facility owned or operated by you, which is located at 1010 Denison Avenue, Cleveland, Ohio 44109.
6. "NEORSD" shall mean the Northeast Ohio Regional Sewer District.
7. "NEORSD collection system" shall mean the NEORSD sewerage collection/treatment system as referred to in the NEORSD control mechanism.
8. "NPDES" shall mean the National Pollution Discharge Elimination System authorized under the Clean Water Act.
9. "Control mechanism" shall have the same meaning as the term is used in 40 C.F.R. Part 403. For the purposes of this Information Request, NEORSD has issued Administrative Order No. 896-S-SIU-12 to CSI to act as the control mechanism.
10. "Storm Water Pollution Prevention Plan" or "SWPPP" is defined as a requirement of the NPDES permit and details required inspections, annual monitoring and Best Management Practices (BMPs).
11. "Domestic wastewater" is defined as wastewater containing only conventional pollutants as defined by Section 304(a)(4) of Clean Water Act. This includes waste and wastewater from humans or household operations.
12. "Dilutional wastewater" is defined as wastewater containing discharges of non-contact cooling water, boiler blowdown or other wastewater discharges that are not considered process wastewater.
13. "Process wastewater" is defined as any water which, during manufacturing or processing, comes into direct contact with or results from the production or use of any raw material, intermediate product, finished product, byproduct, or waste product.
14. "Storm water" is defined as storm water runoff, snow melt runoff, and surface runoff and drainage.
15. "Wastewater" is defined as any water discharged from the facility. This includes domestic wastewater, dilutional wastewater, process wastewater storm water, and any other water discharged to the sewer system.

INSTRUCTIONS

1. Provide a separate narrative response to each and every request set forth in this Information Request. Precede each answer with the reference (e.g., Request No.) and the text of that particular request.
2. Any documents relied upon or used by you to answer any of the requests must be copied and submitted to EPA with your response. All documents must contain a

notation indicating the reference(s) (e.g., Request No. _) to which they are responsive.

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5. For this Information Request, words used in the singular shall also mean and include the plural and vice versa.
6. A statement of certification as provided in this Information Request must be submitted along with your responses every time a submission is made pursuant to this Information Request.
7. You shall maintain the reports and all records reviewed or generated in the course of responding to this Information Request until EPA informs you in writing that maintenance of such records is no longer required.
8. Unless otherwise specified, the Requests for Information cover the entire five-year period immediately preceding the date on which you receive this Information Request.

REQUESTS FOR INFORMATION

1. For each person consulted in preparing your responses to these Requests for Information, provide the full name and title, name of the individual's employer, and business telephone number.
2. For the previous ten year period immediately preceding the date on which you receive this Information Request, provide copies of the application(s) for the NEORS D Control mechanism (issued April 26, 2012), any prior administrative orders, permits, or other control mechanisms issued by NEORS D for discharges of wastewater from the facility, and any additional information or requests to modify these administrative orders, permits, or other control mechanisms.
3. Regardless of the dates any such applications were submitted, provide copies of applications for Permits to Install (PTI) for pretreatment equipment issued by the

Ohio Environmental Protection Agency (Ohio EPA) to you for the facility. Include attachments to the PTI and the copies of as-built construction drawings.

4. For the previous ten year period immediately preceding the date on which you receive this Information Request, provide copies of applications for any permits issued to you for the facility under the NPDES program.
5. Provide copies of any flow monitoring and results of samples taken at the Discharge Point 01 designated in the NEORSD Control mechanism.
6. Provide copies of all flow monitoring and results of all samples taken of wastewater discharged to the NEORSD collection system. CSI does not need to provide duplicate copies of records if the records were provided in response to a prior request.
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8. Provide copies of reports made to NEORSD for any shut down or bypass of pretreatment equipment pursuant to Part 4.G of the NEORSD Control mechanism.
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11. Provide copies of any bills and measurements for wastewater discharged to the NEORSD sewer system from the facility. Include a description of the means for measuring the volume of water discharged.
12. Provide a narrative description of each discharge of wastewater to the NEORSD collection system from the facility, including the date of the discharge, content of the wastewater discharged, the amount of wastewater discharged, and the flow rate of the wastewater discharged.
13. Provide a drawing of the onsite sewer collection system at the facility. In the drawing, indicate all locations where wastewater is discharged to the onsite sewer system. All wastewater will include domestic wastewater, process wastewater, dilutional wastewater, and storm water. The drawing must include the size and location of the following structures and appurtenances:
 - a. Underground pipes and conveyance structures;
 - b. Manholes, catchbasins and inlets;
 - c. All connections to manholes, catchbasins and inlets;
 - d. All pumps conveying wastewater (indicate type of pump);

- e. Valves (indicate type of valve and operation);
- f. All locations where wastewater is discharged to the onsite sewer system;
- g. All locations where trucked or hauled waste is discharged to the onsite sewer system; and
- h. All locations where the onsite system connects to the NEORSR collection system.

If the items depicted on the drawing of the onsite sewer collection system at the facility have changed during the previous ten years, please describe any such changes, including the specific item changed, the date of the change, and the reason for the change.

14. Provide a copy of the Slug Discharge Control Plan (SDCP) detailed in Part 4.E of the NEORSR control mechanism.
15. Provide copies of the following records maintained in support of the SDCP:
 - a. Analysis of raw water accumulated in diked areas prior to discharge to the sewer system;
 - b. Records of stored chemicals listed in Part 4.E.2 of the NEORSR Control mechanism;
 - c. Copies of written incident reports completed following identification of spills or leaks;
 - d. Records of annual employee training on spills and contingency procedures.
16. Provide a list of the dates and volumes of all wastewater discharged from the facility to the NEORSR collection system.
17. Provide a list of all Bioaccumulative Chemicals of Concern (BCCs) which have been brought into the facility for purposes of reclamation, recovery, or treatment. Include in the list the dates any water or wastes derived from the manufacture or blending of BCCs were transported from the Facility. For any water or wastes derived from the manufacture or blending of BCCs that were transported from the Facility, describe the manner in which such water or wastes were disposed and provide any documentation supporting the disposal of such water or wastes. The list of BCCs includes:
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 - Dieldrin
 - Hexachlorobenzene
 - Hexachlorobutadiene
 - Hexachlorocyclohexane (BHC)
 - alpha-Hexachlorocyclohexane
 - beta-Hexachlorocyclohexane
 - delta-Hexachlorocyclohexane

- Lindane
 - Mercury
 - Mirex
 - Octachlorostyrene
 - Photomirex
 - PCBs
 - Pentachlorobenzene
 - 2,3,7,8-TCDD
 - 1,2,3,4-Tetrachlorobenzene
 - 1,2,4,5-Tetrachlorobenzene
 - Toxaphene
18. Provide a list of all chemicals which have been brought into the facility for purposes of reclamation, recovery, or treatment. Include in the list the dates such chemicals were received at the facility and the dates and means of removal from the facility. CSI does not need to provide duplicate copies of records if the records are provided in response to one of the paragraphs contained earlier in this Request.
19. Provide copies of all correspondence between you and NEORS. CSI does not need to provide duplicate copies of correspondence if the documents are provided in response to one of the paragraphs contained earlier in this Request.

Please submit your responses to this request within the designated time frames to:

U. S. Environmental Protection Agency
Attention: Jonathan Moody
Water Enforcement and Compliance Assurance Branch
Water Division, WC-15J
77 West Jackson Blvd.
Chicago, Illinois 60604-3590
(312)-697-2753
moody.jonathan@gmail.com

with a courtesy copy of site map and topographic map required by ILR00 to:

Donna Kniss
Ohio EPA, Division of Surface Water
Pretreatment Program
2110 E. Aurora Road
Twinsburg, Ohio 44087
Phone: 800-686-6330

You may consider confidential the information that you submit to us. You may assert a claim of business confidentiality for any portion of the submitted information, except

effluent data, under 40 C.F.R. Part 2, Subpart B. Information subject to a business confidentiality claim is available to the public only to the extent allowed under 40 C.F.R. Part 2, Subpart B. Failure to assert a business confidentiality claim makes all submitted information available to the public without further notice.

In submitting the information required in this request, CSI shall provide the following certification signed by an official or authorized agent:

I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person(s) who manage the system, or those person(s) directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.

If at any time after submitting the requested information, the signatory determines that any portion of such statement(s) certified as true is false or incorrect, the signatory must notify EPA. Knowingly providing false information in response to this request may be actionable under §309(c)(4) of the Act, and 18 U.S.C. §§ 1001 and 1341.

EPA may use the information submitted in response to this request in an administrative, civil, or criminal action.

This request is not subject to the Paperwork Reduction Act, 44 U.S.C. § 3501 et seq., because it seeks to collect information from specific individuals or entities as part of an administrative action or investigation.

Please contact Jonathan Moody of my staff at (312) 353-4621 or via email at moody.jonathan@epa.gov, or Gary Steinbauer, Office of Regional Counsel, at (312) 886-4306 or steinbauer.gary@epa.gov, if you have any questions about this request. Neither the issuance of this request by EPA nor compliance with this request by you, relieves you of liability for any penalty, fine, remedy, or sanction authorized to be imposed pursuant to Sections 309(b), (c), (d), and/or (g) of the Act, including but not limited to any violations addressed by this request. EPA specifically reserves the right to seek any or all of the remedies specified in Sections 309(b), (c), (d), and/or (g) of the Act.


Tinka G. Hyde
Director, Water Division

6/12/13
Date



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5
77 WEST JACKSON BOULEVARD
CHICAGO, IL 60604-3590

JUN 20 2013

REPLY TO THE ATTENTION OF:

WN-16J

CERTIFIED MAIL 7009 1680 0000 7661 8717
RETURN RECEIPT REQUESTED

Mark Thompson, Director
Terre Haute Wastewater Utility
3200 S. SR 63
Terre Haute, Indiana 47802

Subject: Pretreatment Program Local Limits Information Request
Issued Pursuant to Section 308(a) of the Clean Water Act, 33 U.S.C. § 1318(a)
Docket No. V-W-11-308-12

Dear Mr. Thompson:

The U.S. Environmental Protection Agency, Region 5 received a revised sewer use ordinance along with a local limits study which you provided with a letter dated October 3, 2012. We have reviewed your local limits study and require further explanation on some parts of that study. Jonathan Schweizer of my staff has contacted you via e-mail on March 15, April 5 and May 10, 2013 and has received no response from you. As a result, we are issuing this information request under Section 308(a) of the Clean Water Act (CWA), 33 U.S.C. § 1318(a), so that we may complete our review of your local limits study.

The Indiana Department of Environmental Management issued to Terre Haute a National Pollutant Discharge Elimination System (NPDES) Permit IN0025607 (the Permit) on December 20, 2010. The Permit became effective on January 1, 2011 and expires on December 31, 2015. Terre Haute is required by NPDES Permit IN0025607 to operate its approved industrial pretreatment program approved on July 24, 1986 and any subsequent modifications.

EPA is authorized under Section 308(a) of the CWA, 33 U.S.C. § 1318(a), to require reports and other information necessary to carry out the purpose of the CWA. Accordingly, pursuant to Section 308(a) of the CWA, you are directed to provide EPA with the information requested in the enclosure.

In accordance with Section V, Paragraph 23 of the Information Request, you must include with your response a statement certifying that all information you submit is true and accurate to the best of your knowledge and belief using the certification language provided in that paragraph.

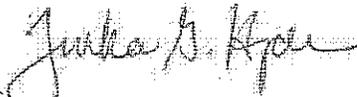
Please exercise care to assure that responses are complete and accurate because Section 309(c)(2) of the CWA, 33 U.S.C. § 1319(c)(2), imposes criminal penalties where false information is knowingly provided to EPA.

You must submit a written response, with the information requested in the enclosure, within 30 days of receipt of this request to:

NPDES Programs Branch (WN-16J)
U.S. Environmental Protection Agency, Region 5
77 West Jackson Boulevard
Chicago, Illinois 60604-3590
Attention: Jonathan Schweizer

Thank you for your cooperation in this matter. Should you have any questions, please contact Jonathan Schweizer of my staff by telephone, at (312) 886-0211 or by e-mail at Schweizer.jonathan@epa.gov.

Sincerely,



Tinka G. Hyde
Director, Water Division

Enclosure

cc: Natalie Maupin, Pretreatment Coordinator, IDEM, w/enclosure

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5

IN THE MATTER OF:)	
)	
City of Terre Haute Board of Public Works)	Proceeding under Section 308(a) of the Clean Water Act, as amended, 33 U.S.C. § 1318(a)
Terre Haute, IN 47802)	
)	
NPDES Permit No. IN0025607)	DOCKET NO: V-W-13-308-1a
)	
Respondent)	
)	

INFORMATION REQUEST

The U.S. Environmental Protection Agency ("EPA") is issuing this Information Request to the City of Terre Haute Board of Public Works, Terre Haute, Indiana ("Terre Haute" or "you") pursuant to the authority vested in the Administrator of EPA by Section 308(a) of the Clean Water Act ("CWA"), 33 U.S.C. § 1318(a). The Administrator has delegated this authority to the Regional Administrator of EPA, Region 5, who has re-delegated this authority to the Director of the Water Division, EPA Region 5.

I. FACTUAL BACKGROUND AND STATUTORY AUTHORITY

1. Section 308(a) of the CWA, 33 U.S.C. § 1318(a), authorizes the Administrator to require the owner or operator of any point source to establish and maintain records, make reports, install, use and maintain monitoring equipment, sample effluent and provide any other information she may reasonably require to carry out the objectives of the CWA.
2. Section 402 of the CWA, 33 U.S.C. § 1342, establishes the National Pollutant Discharge Elimination System ("NPDES") by which the Administrator may issue permits for the discharge of pollutants to the waters of the United States subject to certain conditions.
3. EPA approved the State of Indiana program to issue NPDES permits under Section 402(b) of the CWA, 33 U.S.C § 1342(b). The Indiana Department of Environmental Management ("IDEM") is the NPDES permitting authority for the State of Indiana ("State"). EPA retains the authority to enforce the CWA in Indiana.
4. Section 301(a) of the CWA, 33 U.S.C. § 1311(a), prohibits the discharge of pollutants to the waters of the United States by any person except in compliance with, *inter alia*, a NPDES permit issued pursuant to Section 402 of the CWA, 33 U.S.C. § 1342.
5. Pursuant to Section 402 of the CWA, 33 U.S.C. § 1342, and IC 13-18-2, IDEM issued to Terre Haute a NPDES Permit IN0025607 (the "Permit") on December 20, 2010.

6. The Permit became effective on January 1, 2011 and expires on December 31, 2015.
7. Terre Haute is required by NPDES Permit IN0025607 to operate its approved industrial pretreatment program approved on July 24, 1986 and any subsequent modifications.
8. Terre Haute is the owner and operator of a point source.
9. Terre Haute submitted to EPA a local limits study dated October 3, 2012.

II. INSTRUCTIONS

10. You must respond to this Information Request within 30 calendar days of its receipt by you. Submission instructions are in Section V of this Information Request.
11. You must respond separately to each of the requests. Where a “yes” or “no” answer is requested, you may provide additional information, if desired. Precede each answer with the number of the request to which it corresponds. For each document produced in response to this Information Request, indicate on the document, or in some other reasonable manner, the number of the request to which it corresponds.
12. If you do not have documents responsive to a particular request, state in your written response that you do not have responsive documents.
13. You must keep the reports and all records reviewed or generated in the course of responding to this Information Request until EPA informs you in writing that you are no longer required to keep the reports and records, or for three years, whichever is sooner.

III. DEFINITIONS

14. All terms used but not otherwise defined in this Information Request shall have the meaning provided in the CWA or EPA regulations promulgated under the CWA. Whenever the terms set forth below are used in this Order, the following definitions shall apply:

“Local Limits Study” or “LLS” means the local limits study submitted by the City of Terre Haute to EPA with a transmittal letter dated October 3, 2012.

IV. REQUESTS

15. Explain why 45% removal was used for arsenic and 82% removal was used for total chromium in Table 3 (page 14, top) of the LLS, in light of the fact that the Terre Haute POTW only removed 9% of arsenic (2005) and 58% of total chromium (2010).
16. In Table 3 (page 14, top) of the LLS, please explain your determination of whether available local data is sufficient for developing an accurate removal rate.

17. In reference to Table 3 (page 14, top) of the LLS, please clarify if you chose a default value the median activated sludge treatment removal rates from Appendix R. If not, what did you choose, why did you choose it, and where did that number come from? Please explain how the value was derived and the rationale for selecting the value.
18. Provide the spreadsheets referenced in LOCAL LIMITS CALCULATION METHODOLOGY & RESULTS (page 17) of the LLS.
19. Explain why Table 5 of the LLS shows Cr₆ as limited by the NPDES permit limit, though there is no numerical limit for chromium in Terre Haute's NPDES permit.
20. If the 1.69 mg/l limit for Cr₆ in the LLS is supported, since the report has assumed that total Cr = Cr₆, then explain why the 10 mg/l for total Cr would not need to be reduced to 1.69 mg/l.
21. Explain, as shown in Table 7 of the LLS, the use of categorical standards for cyanide and nickel local limits, even though calculations based on EPA guidance would have resulted in lower numbers.

V. SUBMITTALS

22. Please submit your response to this Information Request within 30 days of your receipt of this Information Request to:

NPDES Programs Branch (WN-16J)
U.S. EPA Region 5
Attn: Jonathan Schweizer
77 West Jackson Boulevard
Chicago, Illinois 60604-3590

23. Terre Haute must return all submittals made pursuant to this Information Request under an authorized signature containing the following certification:

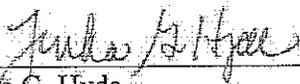
I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate and complete. I am aware that there are significant penalties for submitting false statements and information, including the possibility of fines and imprisonment for knowing violations

24. If the signatory finds at any time after submittal of information that any portion of the submittal is false or incorrect, the signatory shall notify EPA immediately. Knowing submittal of false information to EPA in response to this Order may subject Terre Haute

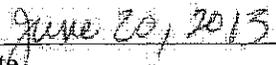
to criminal prosecution under Section 309(c) of the CWA, 33 U.S.C. § 1319(c), and 18 U.S.C. §§ 1001 and 1341.

25. You may not withhold information because you claim it is confidential. However, pursuant to 40 C.F.R. Part 2, Subpart B, you may assert a claim of business confidentiality regarding any portion of the information submitted in response to this Order, as provided in 40 C.F.R. § 2.302(a)(2). The regulations provide that a person may assert a business confidentiality claim covering part or all of the information furnished to EPA when that person submits the information. The manner of asserting such claims is specified in 40 C.F.R. § 2.203(b). Effluent data (as defined in 40 C.F.R. § 2.302(A)(2)) and information in NPDES permit applications is not entitled to confidential treatment. 40 C.F.R. § 122.7. Information subject to a business confidentiality claim is available to the public only to the extent, and by means of the procedures, set forth in 40 C.F.R. Part 2, Subpart B.
26. If you do not assert a claim of business confidentiality when you submit the information, EPA may make the information available to the public without further notice.
27. EPA may use any information submitted in response to this Information Request in support of an administrative, civil or criminal action against Terre Haute.
28. Neither the issuance of this Information Request by EPA nor your compliance with this Information Request relieves you of liability for any penalty, fine, remedy or sanction authorized to be imposed pursuant to Section 309(b), (c), (d), or (g) of the CWA, 33 U.S.C. § 1319(b), (c), (d), or (g), including but not limited to those related to any violations addressed by this Information Request. EPA specifically reserves the right to seek any of the remedies specified in Section 309(b), (c), (d), or (g) of the CWA, 33 U.S.C. § 1319(b), (c), (d), or (g).
29. There can be significant civil or criminal penalties for failing to adequately respond to requests for information issued under the Section 308(a) of the CWA, 33 U.S.C. § 1318(a).

Please contact Jonathan Schweizer of my staff by telephone at (312) 886-0211, or via email at Schweizer.jonathan@epa.gov, if you have any questions about this Information Request.



Tinka G. Hyde
Director, Water Division
U.S. Environmental Protection Agency, Region 5



Date



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5
77 WEST JACKSON BOULEVARD
CHICAGO, IL 60604-3590

JUN 25 2013

REPLY TO THE ATTENTION OF:
WC-15J

CERTIFIED MAIL 7009 1680 0000 7678 6546
RETURN RECEIPT REQUESTED

Dr. Michael Unger
Manager, Sanitary District of Hammond
5143 Columbia Avenue
Hammond, Indiana 46327

Subject: Sanitary District of Hammond Request for Information
Issued Pursuant to Section 308(a) of the Clean Water Act, 33 U.S.C. § 1318(a)
Docket No. V-W-13-308-10

Dear Dr. Unger:

The U.S. Environmental Protection Agency is authorized by the Clean Water Act (CWA), 33 U.S.C. § 1318(a) to require reports and other information necessary to carry out the purpose of the Act. Accordingly, pursuant to section 308 of the Act, you are directed to provide EPA with the information required in the enclosure. The enclosed information request seeks for the Sanitary District of Hammond to collect and carry out sampling of Combined Sewer Overflows (CSOs) and in-stream sampling of the Grand Calumet River and the Little Calumet River in Hammond, Indiana.

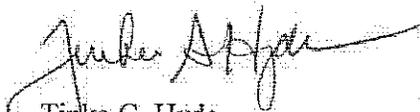
Please submit complete information requested in the accompanying CWA section 308 information request with a statement certifying that all representation contained therein are true and accurate to the best of your knowledge and belief using the certification language provided. Please exercise care to assure that your responses are complete and accurate, because Section 309(c)(2) of Clean Water Act, 33 U.S.C. § 1319(c)(2), provides for the imposition of criminal penalties where false information is knowingly provided to EPA.

Please respond in writing to the information requested in the enclosure to:

Water Enforcement and Compliance Assurance Branch (WC-15J)
U.S. Environmental Protection Agency, Region 5
77 West Jackson Boulevard
Chicago, Illinois 60604-3590
Attention: Felicia Chase, Environmental Scientist

Thank you for your cooperation in this matter. Should you have any questions, please contact Felicia Chase of my staff at (312)886-0240 or by e-mail at chase.felicia@epa.gov.

Sincerely,



Tinka G. Hyde
Director, Water Division

Enclosure

cc: Todd Trinkle, Indiana Department of Environmental Management
Jennifer Lukas-Jackson, United States Department of Justice

**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5**

IN THE MATTER OF:) **PROCEEDING UNDER SECTION**
) **308(a) OF THE CLEAN WATER ACT,**
SANITARY DISTRICT OF HAMMOND) **33 U.S.C. § 1318 (a)**
)
) **DOCKET NO. V-W-13-308-10**

STATUTORY AUTHORITY

This **REQUEST FOR INFORMATION** (Request) is issued pursuant to the authority vested in the Administrator of the U.S. Environmental Protection Agency under Section 308(a) of the Clean Water Act (CWA or Act), 33 U.S.C. § 1318(a). The Administrator has delegated this authority to the Regional Administrator of EPA, Region 5, who has duly redelegated this authority to the undersigned Director, Water Division, EPA Region 5, who hereby issues this Request for Information. The Sanitary District of Hammond (HSD) must submit information responsive to this Request for Information, notwithstanding the possibility that some responsive information may be characterized as confidential. Should HSD so request, any information (other than public information) which the Administrator determines to be confidential will be maintained as confidential information. Requests for confidential treatment must be made when the information is provided, since any information not so identified will not be accorded such protection by the Agency. Under 40 C.F.R. § 122.7, the confidentiality entitlement does not apply to information in permit application forms, and claims of confidentiality will be denied for the following: name and address of any permit applicant or permittee, permit application, permits, and effluent data.

EPA has the authority to use the information generated in response to this request in an administrative, civil, or criminal action. There are significant civil and criminal penalties pursuant to Section 309 of the CWA, 33 U.S.C. § 1319, for failing to respond to requests issued pursuant to CWA Section 308 (a) in a timely, complete, and accurate manner.

This request is being sent to HSD via certified mail. It shall become effective on the date HSD receives the request, as shown on the certified mail receipt (effective date).

I. DEFINITIONS

Unless otherwise defined herein, terms used in this request shall have the meaning given to those terms in the CWA, 33 U.S.C. § 1251 *et seq.*, and the regulations promulgated there under 40 C.F.R. Part 122.

- a) "HSD" shall mean the Sanitary District of Hammond and any agents, employees, contractors, or other entities that performed work or acted in any way on behalf of, or at the

direction of, the Sanitary District of Hammond.

- b) "Authorized agent" shall mean either a principal executive officer, ranking elected official, or an authorized representative having responsibility for the overall operation of HSD's Water Pollution Control Station, such as a plant manager, superintendent, or a position of equivalent responsibility.
- c) "Combined Sewer Overflow" or "CSO" shall mean any discharge from outfalls identified in HSD's Current NPDES Permit, as set forth in Attachment 1.
- d) "Combined Sewer Overflow Outfall" or "CSO Outfall" shall mean the specific point source at a particular location from which a CSO occurs and/or discharges.
- e) "In-Stream" shall mean any water body within HSD's service territory boundaries, including but not limited to the Grand Calumet River and the Little Calumet River. "In-stream samples" shall therefore mean samples taken of those water bodies, as opposed to samples of discharges into those water bodies.
- f) "Record" or "records" shall mean any recording of information in tangible form. It includes, but is not limited to: documents, memoranda, reports, letters, maps, graphs, charts, log books, notes, computer printouts and computer data bases.
- g) "You" or "Your" shall mean HSD.

II. REQUESTS

General Matters

1. Within 7 days of receipt of this information request, HSD shall provide all CSO Outfall and ambient In-Stream data that is in HSD's possession for the parameters E. coli and/or fecal coliform that has been collected since April 1, 2006. HSD shall specify for each piece of data: (a) the CSO Outfall or water body that was sampled; (b) the location of the In-Stream sample by GPS coordinates and mile marker; (c) the date the sample was taken; (d) the quantity of E. coli or fecal coliform per 100 milliliters in the sample; and (e) provide the laboratory reports for said data. HSD shall also identify any sampling of its CSO Outfalls and/or the receiving streams since April 1, 2006 of which it has knowledge, but for which HSD does not have the data. To the extent of its knowledge, HSD shall identify the entity(s) that conducted said sampling; which CSO Outfalls and/or water body were sampled; the parameters that were sampled; and the dates on which sampling was conducted.
2. This Request for Information also requires HSD to collect grab samples at two CSO Outfalls on the Little Calumet River and one CSO Outfall on the Grand Calumet River during a CSO. All grab samples taken pursuant to this Request for Information shall be collected, handled, and analyzed for *Escherichia coli* (*E. coli*) in accordance with 40 C.F.R. Part 136.

3. Within 48 hours of collecting each sample pursuant to this Request for Information, HSD shall notify EPA via email to Felicia Chase, Water Division, at chase.felicia@epa.gov, that a sample has been collected and shall identify the CSO Outfall and/or the In-Stream sampling location.

CSO Samples

4. Beginning 14 calendar days of the effective date, and continuing until October 31, 2013, HSD shall collect grab samples from each of the following CSO outfalls: Kennedy Ave. North (Outfall 005); Kennedy Ave. South (Outfall 006); and Calumet Ave. (Outfall 014) in the following manner:

- a) Frequency of Sampling: HSD shall conduct sampling at each of the three above-named CSO Outfalls at least once every CSO. HSD shall continue to sample in this manner until October 31, 2013.
- b) Number of Samples to Obtain: During each CSO, HSD shall obtain at least one grab sample of the effluent discharged during the first 30 minutes of the CSO.
- c) Location of Sampling: The CSO shall be sampled at the end of pipe of each specified CSO Outfall prior to the CSO entering the receiving stream. If the end of pipe is not reasonably accessible, then the sample should be collected at the accessible manhole on the CSO Outfall line nearest the inaccessible/obstructed CSO Outfall location. In any event, each sample collected shall be representative of the discharges from that CSO Outfall prior to entering the receiving stream.

In-Stream Samples

5. Concurrent with each required CSO sample collected, as described above, HSD shall collect at least one grab sample at a point that is representative of the water quality upstream and downstream of each specific CSO that is being sampled within one hour of the time that the specific CSO is being sampled.

Methodology and Reports

6. HSD shall prepare and provide to EPA a written report of the results of all sampling and analysis required under this request within 30 days after the date that the sampling occurred.
7. The reports shall specify each CSO Outfall that was sampled and shall identify the location at which it was collected (e.g., the end of pipe or at the manhole). If the sample was collected from a location other than the end of pipe, then HSD shall graphically and narratively describe the hydraulic and physical relationship between the sample location and the CSO Outfall location, and shall explain the basis for selecting that location within the Sewer System.

8. The report shall also specify the locations within the receiving stream where each sample was collected, the date of each sample and the most probable number of fecal coliform bacteria and E. coli per 100 milliliters determined to be present in each sample. HSD shall explain its bases for selecting each In-Stream (*i.e.*, both upstream and downstream) sampling point, and shall provide a map illustrating each of the specified CSO Outfalls and each In-Stream sample point. HSD shall attach to the report the laboratory reports for all sampling.
9. HSD shall submit the reports described in paragraphs 6-8 above, and all other records generated in the course of performing the sampling and analyses required above, by December 15, 2013.

III. NOTIFICATION OF INTENT TO COMPLY

10. Within 7 calendar days of HSD's receipt of this Request for Information, HSD shall notify EPA, in writing, as to whether HSD intends to comply with this request.

IV. REPORTS AND CERTIFICATION

11. HSD shall submit the reports required by this Information Request to EPA at the address set forth below, accompanied by the following certification signed by an authorized agent:

I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.

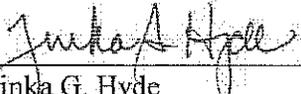
12. The records shall be sent to the following address:

Director, Water Division
United States Environmental Protection Agency – Region 5
77 W. Jackson Blvd.
Chicago, Illinois 60604
ATTN: Felicia Chase, WECA Branch (WC-15J)
Facsimile Number: (312) 692-2542

13. An electronic copy of all records submitted shall be provided simultaneously to: cantello.nicole@epa.gov and chase.felicia@epa.gov

14. This information request is not subject to the Paperwork Reduction Act.

If you have any questions about this Request for Information, please contact Felicia Chase, of my staff, at (312)886-0240 or your counsel can contact Nicole Cantello in the Office of Regional Counsel at (312) 886-2870.



Tinka G. Hyde
Director, Water Division
US EPA
Region 5

6/25/2013
Date

